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Attorneys for Plaintiff
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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

SAMANTHA BOOTH,

Defendant.

CASE NO. 1:20-CR-00238-JLT
GOVERNMENT'S SENTENCING
MEMORANDUM

I. INTRODUCTION

Defendant Samantha Booth is scheduled for sentencing on November 12, 2024, following her guilty plea to Conspiracy to Possess and Possession with Intent to Distribute Methamphetamine and Heroin (Count 7 in the Second Superseding Indictment). In the Presentence Investigation Report (PSR), the U.S. Probation Office recommends a 120-month term of imprisonment, 5 years supervised release, a \$100 special assessment, and no fine.

The government agrees with the PSR's total offense level calculation of 25 and criminal history category of IV. The government recommends a term of 72 months incarceration.

II. STATEMENT OF FACTS

A. Defendant's Conduct

As stated in the PSR and plea agreement, defendant's conduct is as follows:

On or about September 18, 2020, co-defendants Stephanie Madsen and Kenneth Bash planned to

1 transport methamphetamine from the Los Angeles area to Fresno. Between September 21 and
2 September 22, 2020, Madsen packed methamphetamine, which was picked up by James Armstrong and
3 transported to Fresno, CA, EDCA. Once in Fresno, Armstrong took approximately five pounds of
4 methamphetamine to defendant's house, where it was stored in a safe until the narcotics could be further
5 distributed. Defendant took approximately one pound of the methamphetamine and sold it.

6 **III. ANALYSIS OF THE SECTION 3553(A) FACTORS**

7 In sentencing a defendant, 18 U.S.C. § 3553(a)(1) requires the Court to consider the nature and
8 circumstances of the offense and the history and characteristics of defendant. 18 U.S.C. § 3553(a)(2)
9 requires the Court to consider the need for the sentence to reflect the seriousness of the offense, to
10 promote respect for the law, to provide just punishment for the offense, to afford adequate deterrence to
11 criminal conduct, and to protect the public from Defendant's further crimes.

12 The Government agrees with the assessment and analysis of the above-mentioned factors as
13 listed in the PSR, and believe the weight of these factors has been reflected in the recommendation.
14 Defendant's sentencing guidelines range is 84-105 months imprisonment. Given these facts, and the
15 agreement of the parties, the government recommends a sentence of 72 months' imprisonment.

16 Dated: November 9, 2024

17 PHILLIP A. TALBERT
United States Attorney

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19 By: /s/ STEPHANIE M. STOKMAN
STEPHANIE M. STOKMAN
20 Assistant United States Attorney
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